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RESORT GROUP, MANDALAY BAY, LLC, MGM RESORTS FESTIVAL
GROUNDS, LLC, and MGM RESORTS VENUE MANAGEMENT, LLC

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

MGM RESORTS INTERNATIONAL,
MANDALAY RESORT GROUP,
MANDALAY BAY, LLC f/k/a MANDALAY
CORP., MGM RESORTS FESTIVAL
GROUNDS, LLC, MGM RESORTS VENUE
MANAGEMENT, LLC

Plaintiffs,

vs.

CARLOS ACOSTA; EMMANUEL AFFRAN;
GREG AGUAYO; LILLIAN AGUIRRE;

Case No.

**COMPLAINT FOR DECLARATORY
RELIEF**

1 DIONNDRA ALEXANDER; LESLIE
 2 ALWORTH; ENRIQUE ARGUETA; SHANE
 3 ARMSTRONG; IMARI AUSBIE; TINA
 4 MARIE AVERY; JEFFREY BACHMAN;
 5 JOSEPH I. BALAS; BREANNA GRACE
 6 FRANCL BALDRIDGE; MALINDA
 7 BALDRIDGE; COLE BALDWIN; PAUL
 8 BALFOUR; ALICIA BEATTY; ELIZABETH
 9 BEATTY; MATTHEW BEATTY; BRANDY
 10 BEAVER; BRANDON CHARLES BECKETT;
 11 TINA BEDARTES; CHICO BELSER;
 12 CHRISTI BERAN; KAREN BERNEY;
 13 JENNIFER L. BITHELL; RUSSELL BLECK;
 14 AARON BOUPHAPRASEUTH; JOSHUA
 15 BRADY; CHANDRA BRIDGES; CRAIG
 16 ALAN BROCKETT; DEBBIE BROCKETT;
 17 KALI BROCKETT; LEXIA BROCKETT;
 18 CAITLIN BRUNNER; ANDRE BRYANT;
 19 JORI BUCKLAND; TIFFANIE BUEHLER;
 20 ANTHONY BURNS; ANDRETTI CAGE;
 21 KIMBERLY CALDERON; EARLLITRA
 22 DANIELLE CARTER; ATHENA CASTILLA;
 23 SHAYLA CATALDO; TEQUELA
 24 CHAPPELL; SAVANNA CHASCO; DANNY
 25 CLUFF; GREG CLUFF; CODY COFFER;
 26 MARKIE COFFER; CONNIE D. COLEMAN;
 27 KIMBERLY COLLINS; SUE ANN
 28 CORNWELL; DANIEL CORTES; BRETT
 COSSAIRT; MANDI CROWDER; CHANEL
 CUELLAR; JUAN CUELLAR; RAINNA
 RUSK DAVIS; WHITNEY DAY; JOHN
 DEANE; RACHEL DELAPAZ; HANNAH
 DOMINGUEZ; JOMONT DOTTON;
 SANDRA DOUGLAS; MICHAEL DYER;
 HUGH JOSEPH DYER III; SONYA ESTERS;
 EMILY EVANS; MICHELLE EVANS;
 KRISTINA FALCO; CASSANDRA FIGGERS;
 DEANNA FINLEY; JUDITH FISHER;
 BRISTINA FLATT; KENNETH SHAYNE
 FLETCHER; BETH GALOFARO; WILLIAM
 GALVEZ; LACY GANN; DANA GETREU;
 COURTNEY GIBSON; JENNIFER GIBSON;
 MICHAEL MERCED GILARDINO; JIMMY
 GILMORE; TOMAS GONZALEZ; HEATHER
 GOOZE; MICHAEL GREENFIELD; JULIAN
 HAMILTON; ANGEL HANDLIN; DARREL
 HANDLIN; MATTHEW HANSEN; MICHAEL
 HANSSON; CAROL HARDEN; JUSTIN
 HARMAN; LAKHESHA HARRIS; TRINO
 HARRIS; JENNIFER HAUT; ELIZABETH
 HEFLEY; GABRIELLE HEMPHILL;
 WILLIAM HENNING; RICHARD CRAIG
 HERMANN; MARIO HERRERA;
 JACQUELYN HOFFING; MARCELLA
 HOFFMAN; BRITTANY HORTON; MEGAN

1 IANNUZZI; LUCA ICLODEAN; DMOREA
 JACKSON; JARON ANTHONY JAMERSON;
 2 ANGELINA JAMES; COREY JOHNSON;
 DEANDRE JOHNSON; JAYNELLE
 3 JOHNSON; JOHANNA JOHNSON; SARAH
 JOHNSON; EDGAR T. JONES; CHIQUANA
 4 JOSHUA; MYLES KALK; AUTUM
 KAPINKIN; JAWAUNDO W. KIMMONS;
 5 WILLIAM KING; NIKKOLE KNIGHT;
 ANGELL KNITTLE; ANNA KOPP; DAVID
 6 KRONBERG; LORI KRUMME; MARY
 LYNN KUEFFNER; ATHEA LAVIN; AMIAH
 7 LEE; ERIKA LEE; LISA LEE; NICK LEMAY;
 ALAN I. LEVITT; CHARLES LEXION;
 8 YOLANDA LIZARDO; GABRIELA
 LOMAGLIO; VICENTE LOPEZ; SHAWNA
 9 LOTT; JOSHUA LUIZ; JOY LUJAN;
 BRITTANY MACKAY; KERI MAHER;
 10 CHRISTIAN MARQUEZ; TRACI
 MARSHALL; RICHARD MASUCCI;
 11 LINDSEY MATA; TRAVIS MATHESON;
 STEVE MCBEE; DENISE MCCLELLAN;
 12 LONNIE MCCORVEY; LYNNE MCCUE;
 TAMIKA MCGILL; CARMEN MCKINLEY;
 13 CLEVELAND MCMATH; DOREEN
 MEDINA; TREZA MEKHAIL; PAIGE
 14 MELANSON; ROSEMARIE MELANSON;
 STEPHANIE MELANSON; STEPHEN
 15 MELANSON; ESTATE OF AUSTIN MEYER;
 ROMEO MEYER; ROBERT MILLER;
 16 PHYLYSSA MONTOYA; ALYSSA MOORE;
 KATRINA MORGAN; SHANCELA MYERS;
 17 MARIROSE NAING; ANTHONY DON E.
 NOARBE; AMBER NORCIA; ELSA NUNEZ;
 18 ROSE O'TOOLE; KUULEI OTIS; STACIE
 OWENS; CHAD PACKARD; KAYCEE
 19 PAUL; ELISA PEREZ; ANGELA MARIE
 PERRY; JEREMY PICKETT; JOSE PLAZA;
 20 MACKENZIE PLUTA; DARRIAN PORTER;
 LAURA A. PUGLIA; KARMJIT RAJU;
 21 JASMINE REIN; STANLEY RENDON; LEA
 RICHMOND; ISRAEL RIVERA; TONIA
 22 ROCHELEAU; MICHAEL ROLLAND;
 MARK RUSSELL; VINCENT SAGER;
 23 CHRISTOPHER SALINAS; LENEA
 SAMPSON; ALYSSA SANDS; JOSEPH
 24 SARTIN; SARAH SCARLETT; SHAWN
 SCARLETT; SHAYLENNE SCARLETT; KIM
 25 SCHMITZ; ALISON SHEEHE;
 CHRISTOPHER SHUEMAKER; BREANNA
 26 SKAGEN; JENNIFER SKOFF; CHEYENNE
 SLOAN; EDEN SMITH; JASPER SMITH;
 27 YVONNE SMITH; MARTIN SOLANO;
 SHELBY STALKER; CHRIS STEWART;
 28 GREGORY TAVERNITE; SAM TAYLOR;

1 WENDY TAYLOR-HILL; REGINALD
2 THARPS; CHRISTINA THEBEAU; DAVID
3 W. THERIAULT; BREYANA THOMAS;
4 GABRIELLE THOMAS; SAVANNAH
5 THOMAS; STEVEN THOME; ALVA BRUCE
6 TILLEY; MARIYA TORO; KATHRYN
7 TRESSLER; JENNIFER A. TURNER;
8 DEBORAH URRIZAGA; WILLIAM F.
9 VANDERVEER; FRANK VEALENCIS;
10 TAMARA VEALENCIS; REGINA VIOLA;
11 ALYSSA WALKER; TIKIESHA WASP;
12 DONALD WELTY; ZACHARY WILCOX;
13 JORDAN WILKINSON; JEFFERY
14 WILLIAMS; TERACIO WILLIAMS; GARY
15 "OPIE" ALLEN WISE; JOHN YONTS; JAMIE
16 ZALESKI; JANET ZMYEWSKI; THOMAS
17 ZMYEWSKI,

18 DEFENDANTS.

INTRODUCTION

1
2 1. On October 1, 2017, Stephen Paddock carried out a mass attack at the Route 91
3 Harvest Festival in Las Vegas, Nevada.

4 2. Paddock intended to inflict mass injury, death and destruction. He killed 58
5 persons and injured some 500 others. Paddock's attack resulted in the highest number of deaths of
6 any mass shooting in the Nation's history.

7 3. Security for the concert was provided by Contemporary Services Corporation,
8 whose security services have been certified by the Secretary of Homeland Security for protecting
9 against and responding to acts of mass injury and destruction.

10 4. Recognizing the national interest in such events, and in the development and
11 deployment of services certified by the Secretary of Homeland Security to prevent and respond to
12 such events, Congress has provided original and exclusive federal jurisdiction for any claims of
13 injuries arising out of or relating to mass violence where services certified by the Department were
14 deployed.

15 5. Plaintiff MGM Resorts Festival Grounds, LLC owns and operates the Las Vegas
16 Village, at 3901 South Las Vegas Boulevard, Las Vegas, Nevada 89119, where the Route 91
17 Harvest Festival was held. Plaintiff Mandalay Bay, LLC owns and operates the Mandalay Bay
18 resort, which is adjacent to Las Vegas Village. Plaintiff MGM Resorts International is the parent
19 corporation, with an indirect 100% interest in Mandalay Bay, LLC, and MGM Resorts Festival
20 Grounds. Plaintiff MGM Resorts Venue Management, LLC is a Nevada limited liability
21 company.

22 6. Paddock carried out his mass attack on the concert from a room on the 32nd floor
23 of the Mandalay Bay resort.

24 7. Following Paddock's attack, over 2,500 individuals ("Claimants") have brought
25 lawsuits, or threatened to bring lawsuits, against Plaintiffs MGM Resorts Festival Grounds, LLC,
26 MGM Resorts International, Mandalay Bay, LLC, Mandalay Resort Group, and MGM Resorts
27 Venue Management, LLC (collectively, "the MGM Parties"), alleging that the MGM Parties
28 (among others) are liable for deaths, injuries, and emotional distress resulting from Paddock's

1 attack. Claimants subsequently voluntarily dismissed these cases before they could be resolved,
2 apparently with the intent of refileing.

3 8. Named as defendants in this case are Claimants who have brought lawsuits (which
4 they subsequently voluntarily dismissed) against the MGM Parties, alleging claims arising from
5 Paddock's attack, and persons who, through counsel, have threatened to bring such claims against
6 the MGM Parties.

7 9. Congress has enacted legislation to support the development of new technologies
8 and services to prevent and respond to mass violence. That legislation, the Support Anti-
9 Terrorism by Fostering Effective Technologies Act of 2002, 6 U.S.C. §§ 441-444 (also known by
10 the acronym, the "SAFETY Act"), provides a calibrated balance of remedies and limitations on
11 liabilities arising from mass attacks committed on U.S. soil where services certified by the
12 Department of Homeland Security were deployed.

13 10. In the case of Paddock's mass attack, certified technologies or services were
14 deployed by a professional security company, Contemporary Services Corporation ("CSC"),
15 which was employed as the Security Vendor for the Route 91 concert. As alleged in more detail
16 below, Paddock's mass attack meets the requirements of the SAFETY Act as set forth in the
17 statute and the Regulations promulgated by the Department of Homeland Security.

18 11. Defendants' actual and threatened lawsuits implicate the services provided by CSC
19 because they implicate security at the concert, for example security training, emergency response,
20 evacuation, and adequacy of egress.

21 12. As a result, the SAFETY Act applies to and governs all actions and any claims
22 arising out of or relating to Paddock's mass attack. There are five key aspects of the Act and
23 implementing regulations promulgated by the Department of Homeland Security as authorized and
24 contemplated by the SAFETY Act. 6 C.F.R. § 25.1 et seq.

25 13. First, the SAFETY Act creates a "Federal cause of action for claims arising out of
26 [or] relating to" an act of mass violence where certified services were deployed and where such
27 claims may result in losses to the Seller of the services. 6 U.S.C. § 442(a)(1).

28 14. Second, the SAFETY Act expressly provides the federal courts with "original and

1 exclusive jurisdiction over all actions for any claim for loss” arising out of or related to such an
2 attack. 6 U.S.C. § 442(a)(2).

3 15. Third, as confirmed by the Secretary’s implementing regulations promulgated after
4 enactment of the SAFETY Act, the federal cause of action created by the statute is the exclusive
5 claim available in such circumstances. 6 U.S.C.

6 § 442(a)(1). The regulations state: “There shall exist only one cause of action for loss of property,
7 personal injury, or death for performance or non-performance of the Seller’s Qualified Anti–
8 Terrorism Technology in relation to an Act of Terrorism.” 6 C.F.R. § 25.7(d).

9 16. Fourth, the regulations further provide that “Such cause of action may be brought
10 only against the Seller of the Qualified Anti–Terrorism Technology and may not be brought
11 against the buyers, the buyers’ contractors, or downstream users of the Technology, the Seller’s
12 suppliers or contractors, or any other person or entity.” 6 C.F.R. § 25.7(d).

13 17. Fifth, to ensure compensation for victims in appropriate cases, the SAFETY Act
14 requires that the Seller “obtain liability insurance of such types and in such amounts as shall be
15 required in accordance with this section and certified by the Secretary to satisfy otherwise
16 compensable third-party claims arising out of, relating to, or resulting from an act of terrorism.” 6
17 U.S.C. § 443(a)(1).

18 18. Congress enacted the SAFETY Act in recognition of the strong national interest in
19 encouraging the development and use of technologies and services that can help prevent and
20 respond to mass violence. The Act does so in part by assurance of limited liability in the
21 unfortunate event that an incident of mass violence occurs and injuries occur despite the
22 deployment of such technology. The Act also does so by creating original and exclusive
23 jurisdiction for the resolution of all controversies in federal court. 6 U.S.C. § 442(a)(2).

24 19. The SAFETY Act expressly provides the federal courts with original and exclusive
25 jurisdiction over “all actions for and any claims for loss [or] injury” arising out of or relating to a
26 mass attack where certified services were provided and where such claims *may* result in losses to
27 the seller of those services. The Act and the associated regulations make clear that any such claim
28 against the MGM Parties must be dismissed.

20. By this action, the MGM Parties seek a declaratory judgment and further relief pursuant to the Declaratory Judgment Act, 28 U.S.C. §§ 2201 and 2202, that the MGM parties cannot be held liable to Defendants for deaths, injuries, or other damages arising from Paddock's attack.

PARTIES

A. PLAINTIFFS

21. Plaintiff MGM RESORTS INTERNATIONAL is a Delaware corporation with its principal place of business in Las Vegas, Nevada.

22. Plaintiff MANDALAY RESORT GROUP is a Nevada corporation with its principal place of business in Las Vegas, Nevada.

23. Plaintiff, MANDALAY BAY, LLC f/k/a MANDALAY CORP. is a Nevada limited liability company with a single member, Mandalay Resort Group.

24. Plaintiff MGM RESORTS FESTIVAL GROUNDS, LLC is a Nevada limited liability company with a single member, Mandalay Resort Group.

25. Plaintiff MGM RESORTS VENUE MANAGEMENT, LLC is a Nevada limited liability company with a single member, MGM Resorts International.

B. DEFENDANTS

26. Plaintiffs are informed and believe, and thereon allege, that defendant Carlos Acosta is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*, filed November 20, 2017, in the Los Angeles Superior Court ("LASC"), case number BC684047.

27. Plaintiffs are informed and believe, and thereon allege, that defendant Emmanuel Affran is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*, filed November 20, 2017, in the Los Angeles Superior Court ("LASC"), case number BC684047.

1 28. Plaintiffs are informed and believe and thereon allege that Defendant Greg Aguayo
2 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
3 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
4 Nevada.

5 29. Plaintiffs are informed and believe and thereon allege that Defendant Lillian
6 Aguirre is a resident of the State of Nevada. Defendant has, through counsel, asserted or
7 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
8 Las Vegas, Nevada.

9 30. Plaintiffs are informed and believe, and thereon allege, that defendant Dionndra
10 Alexander is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which
11 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims
12 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v.*
13 *MGM*, filed November 20, 2017, in the Los Angeles Superior Court ("LASC"), case number
14 BC684047.

15 31. Plaintiffs are informed and believe and thereon allege that Defendant Leslie
16 Alworth is a resident of the State of Nevada. Defendant has, through counsel, asserted or
17 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
18 Las Vegas, Nevada.

19 32. Plaintiffs are informed and believe, and thereon allege, that defendant Enrique
20 Argueta is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
21 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
22 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
23 filed November 20, 2017, in the Los Angeles Superior Court ("LASC"), case number BC684047.

24 33. Plaintiffs are informed and believe, and thereon allege, that defendant Shane
25 Armstrong is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which
26 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims
27 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Athena Castilla v.*
28 *MGM*, filed October 18, 2017, in the Los Angeles Superior Court ("LASC"), case number

1 BC680193.

2 34. Plaintiffs are informed and believe, and thereon allege, that defendant Imari Ausbie
3 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
4 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
5 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
6 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

7 35. Plaintiffs are informed and believe, and thereon allege, that defendant Tina Marie
8 Avery is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
9 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
10 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
11 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

12 36. Plaintiffs are informed and believe and thereon allege that Defendant Jeffrey
13 Bachman is a resident of the State of Nevada. Defendant has, through counsel, asserted or
14 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
15 Las Vegas, Nevada.

16 37. Plaintiffs are informed and believe and thereon allege that Defendant Joseph I.
17 Balas is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened
18 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
19 Nevada.

20 38. Plaintiffs are informed and believe, and thereon allege, that defendant Breanna
21 Grace Franci Baldrige is a resident of the State of Nevada. Defendant has previously filed a
22 lawsuit (which was subsequently voluntarily dismissed) against one or more of the Plaintiffs,
23 asserting claims arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in
24 *Baldrige, et al. v. MGM*, filed January 18, 2018, in Clark County District Court (“Clark
25 County”), case number A-18-767981-C.

26 39. Plaintiffs are informed and believe, and thereon allege, that defendant Malinda
27 Baldrige is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which
28 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims

1 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Baldrige, et al. v.*
2 *MGM*, filed January 18, 2018, in Clark County District Court (“Clark County”), case number A-
3 18-767981-C.

4 40. Plaintiffs are informed and believe, and thereon allege, that defendant Cole
5 Baldwin is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
6 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
7 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
8 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

9 41. Plaintiffs are informed and believe and thereon allege that Defendant Paul Balfour
10 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
11 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
12 Nevada.

13 42. Plaintiffs are informed and believe and thereon allege that Defendant Alicia Beatty
14 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
15 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
16 Nevada.

17 43. Plaintiffs are informed and believe and thereon allege that Defendant Elizabeth
18 Beatty is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened
19 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
20 Nevada.

21 44. Plaintiffs are informed and believe and thereon allege that Defendant Matthew
22 Beatty is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened
23 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
24 Nevada.

25 45. Plaintiffs are informed and believe, and thereon allege, that defendant Brandy
26 Beaver is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
27 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
28 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,

1 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

2 46. Plaintiffs are informed and believe, and thereon allege, that defendant Brandon
3 Charles Beckett is a resident of the State of Nevada. Defendant has previously filed a lawsuit
4 (which was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting
5 claims arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et*
6 *al. v. MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number
7 BC684047.

8 47. Plaintiffs are informed and believe and thereon allege that Defendant Tina Bedartes
9 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
10 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
11 Nevada.

12 48. Plaintiffs are informed and believe, and thereon allege, that defendant Chico Belser
13 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
14 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
15 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
16 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

17 49. Plaintiffs are informed and believe, and thereon allege, that defendant Christi Beran
18 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
19 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
20 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
21 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

22 50. Plaintiffs are informed and believe and thereon allege that Defendant Karen Berney
23 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
24 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
25 Nevada.

26 51. Plaintiffs are informed and believe, and thereon allege, that defendant Jennifer L.
27 Bithell is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
28 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising

1 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
2 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

3 52. Plaintiffs are informed and believe, and thereon allege, that defendant Russell
4 Bleck is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
5 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
6 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Mayfield, et al. v. MGM*,
7 filed December 15, 2017, in the Los Angeles Superior Court (“LASC”), case number BC687120.

8 53. Plaintiffs are informed and believe, and thereon allege, that defendant Aaron
9 Bouphapraseuth is a resident of the State of Nevada. Defendant has previously filed a lawsuit
10 (which was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting
11 claims arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et*
12 *al. v. MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number
13 BC684047.

14 54. Plaintiffs are informed and believe and thereon allege that Defendant Joshua Brady
15 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
16 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
17 Nevada.

18 55. Plaintiffs are informed and believe, and thereon allege, that defendant Chandra
19 Bridges is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
20 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
21 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
22 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

23 56. Plaintiffs are informed and believe, and thereon allege, that defendant Craig Alan
24 Brockett is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
25 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
26 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
27 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

28 57. Plaintiffs are informed and believe, and thereon allege, that defendant Debbie

1 Brockett is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
2 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
3 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
4 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

5 58. Plaintiffs are informed and believe, and thereon allege, that defendant Kali Brockett
6 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
7 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
8 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
9 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

10 59. Plaintiffs are informed and believe, and thereon allege, that defendant Lexia
11 Brockett is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
12 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
13 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
14 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

15 60. Plaintiffs are informed and believe, and thereon allege, that defendant Caitlin
16 Brunner is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
17 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
18 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Brunner v. MGM*, filed
19 November 15, 2017, in the Clark County District Court (“Clark County”), case number A-17-
20 764745-C.

21 61. Plaintiffs are informed and believe, and thereon allege, that defendant Andre
22 Bryant is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
23 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
24 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
25 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

26 62. Plaintiffs are informed and believe, and thereon allege, that defendant Jori
27 Buckland is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
28 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising

1 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Buckland v. MGM*, filed
2 November 15, 2017, in the Clark County District Court (“Clark County”), case number A-17-
3 764741-C.

4 63. Plaintiffs are informed and believe and thereon allege that Defendant Tiffanie
5 Buehler is a resident of the State of Nevada. Defendant has, through counsel, asserted or
6 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
7 Las Vegas, Nevada.

8 64. Plaintiffs are informed and believe and thereon allege that Defendant Anthony
9 Burns is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened
10 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
11 Nevada.

12 65. Plaintiffs are informed and believe, and thereon allege, that defendant Andretti
13 Cage is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
14 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
15 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
16 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

17 66. Plaintiffs are informed and believe, and thereon allege, that defendant Kimberly
18 Calderon is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
19 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
20 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Melanson, et al. v. MGM*,
21 filed January 4, 2018, in the Clark County District Court (“Clark County”), case number A-18-
22 767288-C.

23 67. Plaintiffs are informed and believe, and thereon allege, that defendant Earllitra
24 Danielle Carter is a resident of the State of Nevada. Defendant has previously filed a lawsuit
25 (which was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting
26 claims arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et*
27 *al. v. MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number
28 BC684047.

1 68. Plaintiffs are informed and believe, and thereon allege, that defendant Athena
2 Castilla is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
3 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
4 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Athena Castilla v. MGM*,
5 filed October 18, 2017, in the Los Angeles Superior Court (“LASC”), case number BC680193.

6 69. Plaintiffs are informed and believe, and thereon allege, that defendant Shayla
7 Cataldo is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
8 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
9 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Cataldo v. MGM*, filed
10 November 15, 2017, in the Clark County District Court (“Clark County”), case number A-17-
11 764738-C.

12 70. Plaintiffs are informed and believe, and thereon allege, that defendant Tequila
13 Chappell is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
14 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
15 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
16 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

17 71. Plaintiffs are informed and believe and thereon allege that Defendant Savanna
18 Chasco is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened
19 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
20 Nevada.

21 72. Plaintiffs are informed and believe, and thereon allege, that defendant Danny Cluff
22 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
23 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
24 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
25 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

26 73. Plaintiffs are informed and believe and thereon allege that Defendant Greg Cluff is
27 a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to assert
28 claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas, Nevada.

1 74. Plaintiffs are informed and believe and thereon allege that Defendant Cody Coffe
2 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
3 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
4 Nevada.

5 75. Plaintiffs are informed and believe, and thereon allege, that defendant Markie
6 Coffe is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
7 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
8 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
9 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

10 76. Plaintiffs are informed and believe, and thereon allege, that defendant Connie D.
11 Coleman is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
12 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
13 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Gasper, et al. v. MGM*, filed
14 November 20, 2017, in Los Angeles Superior Court (“LASC”), case number BC684143

15 77. Plaintiffs are informed and believe, and thereon allege, that defendant Kimberly
16 Collins is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
17 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
18 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
19 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

20 78. Plaintiffs are informed and believe and thereon allege that Defendant Sue Ann
21 Cornwell is a resident of the State of Nevada. Defendant has, through counsel, asserted or
22 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
23 Las Vegas, Nevada.

24 79. Plaintiffs are informed and believe, and thereon allege, that defendant Daniel
25 Cortes is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
26 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
27 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
28 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

1 80. Plaintiffs are informed and believe, and thereon allege, that defendant Brett
2 Cossairt is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
3 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
4 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
5 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

6 81. Plaintiffs are informed and believe and thereon allege that Defendant Mandi
7 Crowder is a resident of the State of Nevada. Defendant has, through counsel, asserted or
8 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
9 Las Vegas, Nevada.

10 82. Plaintiffs are informed and believe and thereon allege that Defendant Chanell
11 Cuellar is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened
12 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
13 Nevada.

14 83. Plaintiffs are informed and believe and thereon allege that Defendant Juan Cuellar
15 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
16 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
17 Nevada.

18 84. Plaintiffs are informed and believe, and thereon allege, that defendant Rainna Rusk
19 Davis is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
20 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
21 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
22 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

23 85. Plaintiffs are informed and believe and thereon allege that Defendant Whitney Day
24 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
25 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
26 Nevada.

27 86. Plaintiffs are informed and believe and thereon allege that Defendant John Deane is
28 a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to assert

1 claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas, Nevada.

2 87. Plaintiffs are informed and believe, and thereon allege, that defendant Rachel
3 DelaPaz is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
4 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
5 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
6 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

7 88. Plaintiffs are informed and believe, and thereon allege, that defendant Hannah
8 Dominguez is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which
9 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims
10 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v.*
11 *MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number
12 BC684047.

13 89. Plaintiffs are informed and believe, and thereon allege, that defendant Jomont
14 Dotton is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
15 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
16 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
17 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

18 90. Plaintiffs are informed and believe, and thereon allege, that defendant Sandra
19 Douglas is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
20 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
21 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
22 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

23 91. Plaintiffs are informed and believe, and thereon allege, that defendant Michael
24 Dyer is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
25 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
26 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
27 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

28 92. Plaintiffs are informed and believe, and thereon allege, that defendant Hugh Joseph

1 Dyer III is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
2 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
3 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
4 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

5 93. Plaintiffs are informed and believe, and thereon allege, that defendant Sonya Esters
6 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
7 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
8 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
9 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

10 94. Plaintiffs are informed and believe and thereon allege that Defendant Emily Evans
11 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
12 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
13 Nevada.

14 95. Plaintiffs are informed and believe, and thereon allege, that defendant Michelle
15 Evans is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
16 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
17 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
18 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

19 96. Plaintiffs are informed and believe, and thereon allege, that defendant Kristina
20 Falco is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
21 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
22 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
23 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

24 97. Plaintiffs are informed and believe, and thereon allege, that defendant Cassandra
25 Figgers is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
26 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
27 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
28 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

1 98. Plaintiffs are informed and believe and thereon allege that Defendant Deanna
2 Finley is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened
3 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
4 Nevada.

5 99. Plaintiffs are informed and believe, and thereon allege, that defendant Judith Fisher
6 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
7 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
8 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
9 filed November 20, 2017, in the Los Angeles Superior Court ("LASC"), case number BC684047.

10 100. Plaintiffs are informed and believe, and thereon allege, that defendant Bristina Flatt
11 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
12 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
13 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
14 filed November 20, 2017, in the Los Angeles Superior Court ("LASC"), case number BC684047.

15 101. Plaintiffs are informed and believe, and thereon allege, that defendant Kenneth
16 Shayne Fletcher is a resident of the State of Nevada. Defendant has previously filed a lawsuit
17 (which was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting
18 claims arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et*
19 *al. v. MGM*, filed November 20, 2017, in the Los Angeles Superior Court ("LASC"), case number
20 BC684047.

21 102. Plaintiffs are informed and believe and thereon allege that Defendant Beth Galofaro
22 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
23 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
24 Nevada.

25 103. Plaintiffs are informed and believe, and thereon allege, that defendant William
26 Galvez is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
27 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
28 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,

1 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

2 104. Plaintiffs are informed and believe and thereon allege that Defendant Lacy Gann is
3 a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to assert
4 claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas, Nevada.

5 105. Plaintiffs are informed and believe and thereon allege that Defendant Dana Getreu
6 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
7 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
8 Nevada.

9 106. Plaintiffs are informed and believe, and thereon allege, that defendant Courtney
10 Gibson is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
11 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
12 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
13 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

14 107. Plaintiffs are informed and believe and thereon allege that Defendant Jennifer
15 Gibson is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened
16 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
17 Nevada.

18 108. Plaintiffs are informed and believe, and thereon allege, that defendant Michael
19 Merced Gilardino is a resident of the State of Nevada. Defendant has previously filed a lawsuit
20 (which was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting
21 claims arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et*
22 *al. v. MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number
23 BC684047.

24 109. Plaintiffs are informed and believe and thereon allege that Defendant Jimmy
25 Gilmore is a resident of the State of Nevada. Defendant has, through counsel, asserted or
26 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
27 Las Vegas, Nevada.

28 110. Plaintiffs are informed and believe, and thereon allege, that defendant Tomas

1 Gonzalez is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
2 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
3 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
4 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

5 111. Plaintiffs are informed and believe, and thereon allege, that defendant Heather
6 Gooze is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
7 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
8 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Gooze v. MGM*, filed
9 November 15, 2017, in the Clark County District Court (“Clark County”), case number A-17-
10 764718-C.

11 112. Plaintiffs are informed and believe, and thereon allege, that defendant Michael
12 Greenfield is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which
13 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims
14 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Mayfield, et al. v.*
15 *MGM*, filed December 15, 2017, in the Los Angeles Superior Court (“LASC”), case number
16 BC687120.

17 113. Plaintiffs are informed and believe, and thereon allege, that defendant Julian
18 Hamilton is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
19 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
20 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
21 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

22 114. Plaintiffs are informed and believe and thereon allege that Defendant Angel
23 Handlin is a resident of the State of Nevada. Defendant has, through counsel, asserted or
24 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
25 Las Vegas, Nevada.

26 115. Plaintiffs are informed and believe and thereon allege that Defendant Darrel
27 Handlin is a resident of the State of Nevada. Defendant has, through counsel, asserted or
28 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in

1 Las Vegas, Nevada.

2 116. Plaintiffs are informed and believe, and thereon allege, that defendant Matthew
3 Hansen is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
4 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
5 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
6 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

7 117. Plaintiffs are informed and believe and thereon allege that Defendant Michael
8 Hansson is a resident of the State of Nevada. Defendant has, through counsel, asserted or
9 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
10 Las Vegas, Nevada.

11 118. Plaintiffs are informed and believe, and thereon allege, that defendant Carol Harden
12 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
13 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
14 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
15 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

16 119. Plaintiffs are informed and believe and thereon allege that Defendant Justin
17 Harman is a resident of the State of Nevada. Defendant has, through counsel, asserted or
18 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
19 Las Vegas, Nevada.

20 120. Plaintiffs are informed and believe, and thereon allege, that defendant Lakhesha
21 Harris is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
22 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
23 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
24 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

25 121. Plaintiffs are informed and believe, and thereon allege, that defendant Trino Harris
26 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
27 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
28 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,

1 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

2 122. Plaintiffs are informed and believe, and thereon allege, that defendant Jennifer Haut
3 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
4 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
5 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
6 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

7 123. Plaintiffs are informed and believe and thereon allege that Defendant Elizabeth
8 Hefley is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened
9 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
10 Nevada.

11 124. Plaintiffs are informed and believe and thereon allege that Defendant Gabrielle
12 Hemphill is a resident of the State of Nevada. Defendant has, through counsel, asserted or
13 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
14 Las Vegas, Nevada.

15 125. Plaintiffs are informed and believe and thereon allege that Defendant William
16 Henning is a resident of the State of Nevada. Defendant has, through counsel, asserted or
17 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
18 Las Vegas, Nevada.

19 126. Plaintiffs are informed and believe, and thereon allege, that defendant Richard
20 Craig Hermann is a resident of the State of Nevada. Defendant has previously filed a lawsuit
21 (which was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting
22 claims arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et*
23 *al. v. MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number
24 BC684047.

25 127. Plaintiffs are informed and believe, and thereon allege, that defendant Mario
26 Herrera is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
27 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
28 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,

1 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

2 128. Plaintiffs are informed and believe and thereon allege that Defendant Jacquelyn
3 Hoffing is a resident of the State of Nevada. Defendant has, through counsel, asserted or
4 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
5 Las Vegas, Nevada.

6 129. Plaintiffs are informed and believe, and thereon allege, that defendant Marcella
7 Hoffman is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
8 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
9 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
10 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

11 130. Plaintiffs are informed and believe, and thereon allege, that defendant Brittany
12 Horton is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
13 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
14 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
15 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

16 131. Plaintiffs are informed and believe and thereon allege that Defendant Megan
17 Iannuzzi is a resident of the State of Nevada. Defendant has, through counsel, asserted or
18 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
19 Las Vegas, Nevada.

20 132. Plaintiffs are informed and believe, and thereon allege, that defendant Luca
21 Iclodean is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
22 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
23 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Iclodean v. MGM*, filed
24 November 15, 2017, in the Clark County District Court (“Clark County”), case number A-17-
25 764716-C.

26 133. Plaintiffs are informed and believe, and thereon allege, that defendant Dmorea
27 Jackson is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
28 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising

1 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
2 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

3 134. Plaintiffs are informed and believe, and thereon allege, that defendant Jaron
4 Anthony Jamerson is a resident of the State of Nevada. Defendant has previously filed a lawsuit
5 (which was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting
6 claims arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et*
7 *al. v. MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number
8 BC684047.

9 135. Plaintiffs are informed and believe, and thereon allege, that defendant Angelina
10 James is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
11 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
12 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
13 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

14 136. Plaintiffs are informed and believe, and thereon allege, that defendant Corey
15 Johnson is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
16 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
17 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
18 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

19 137. Plaintiffs are informed and believe, and thereon allege, that defendant DeAndre
20 Johnson is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
21 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
22 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
23 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

24 138. Plaintiffs are informed and believe, and thereon allege, that defendant Jaynelle
25 Johnson is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
26 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
27 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
28 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

1 139. Plaintiffs are informed and believe, and thereon allege, that defendant Johanna
2 Johnson is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
3 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
4 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
5 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

6 140. Plaintiffs are informed and believe, and thereon allege, that defendant Sarah
7 Johnson is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
8 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
9 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
10 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

11 141. Plaintiffs are informed and believe, and thereon allege, that defendant Edgar T.
12 Jones is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
13 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
14 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
15 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

16 142. Plaintiffs are informed and believe, and thereon allege, that defendant Chiquana
17 Joshua is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
18 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
19 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
20 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

21 143. Plaintiffs are informed and believe and thereon allege that Defendant Myles Kalk is
22 a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to assert
23 claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas, Nevada.

24 144. Plaintiffs are informed and believe and thereon allege that Defendant Autum
25 Kapinkin is a resident of the State of Nevada. Defendant has, through counsel, asserted or
26 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
27 Las Vegas, Nevada.

28 145. Plaintiffs are informed and believe, and thereon allege, that defendant Jawaundo W.

1 Kimmons is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which
2 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims
3 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v.*
4 *MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number
5 BC684047.

6 146. Plaintiffs are informed and believe, and thereon allege, that defendant William
7 King is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
8 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
9 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Melanson, et al. v. MGM*,
10 filed January 4, 2018, in the Clark County District Court (“Clark County”), case number A-18-
11 767288-C.

12 147. Plaintiffs are informed and believe and thereon allege that Defendant Nikkole
13 Knight is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened
14 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
15 Nevada.

16 148. Plaintiffs are informed and believe, and thereon allege, that defendant Angell
17 Knittle is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
18 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
19 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
20 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

21 149. Plaintiffs are informed and believe and thereon allege that Defendant Anna Kopp is
22 a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to assert
23 claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas, Nevada.

24 150. Plaintiffs are informed and believe, and thereon allege, that defendant David
25 Kronberg is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
26 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
27 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
28 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

1 151. Plaintiffs are informed and believe and thereon allege that Defendant Lori Krumme
2 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
3 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
4 Nevada.

5 152. Plaintiffs are informed and believe, and thereon allege, that defendant Mary Lynn
6 Kueffner is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
7 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
8 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
9 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

10 153. Plaintiffs are informed and believe and thereon allege that Defendant Athea Lavin
11 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
12 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
13 Nevada.

14 154. Plaintiffs are informed and believe, and thereon allege, that defendant Amiah Lee is
15 a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
16 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
17 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
18 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

19 155. Plaintiffs are informed and believe, and thereon allege, that defendant Erika Lee is
20 a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
21 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
22 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
23 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

24 156. Plaintiffs are informed and believe, and thereon allege, that defendant Lisa Lee is a
25 resident of the State of Nevada. Defendant has previously filed a lawsuit (which was subsequently
26 voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising from the
27 October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*, filed
28 November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

1 157. Plaintiffs are informed and believe, and thereon allege, that defendant Nick Lemay
2 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
3 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
4 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
5 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

6 158. Plaintiffs are informed and believe, and thereon allege, that defendant Alan I. Levitt
7 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
8 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
9 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Gasper, et al. v. MGM*, filed
10 November 20, 2017, in Los Angeles Superior Court (“LASC”), case number BC684143

11 159. Plaintiffs are informed and believe, and thereon allege, that defendant Charles
12 Lexion is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
13 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
14 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
15 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

16 160. Plaintiffs are informed and believe, and thereon allege, that defendant Yolanda
17 Lizardo is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
18 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
19 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
20 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

21 161. Plaintiffs are informed and believe and thereon allege that Defendant Gabriela
22 Lomaglio is a resident of the State of Nevada. Defendant has, through counsel, asserted or
23 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
24 Las Vegas, Nevada.

25 162. Plaintiffs are informed and believe, and thereon allege, that defendant Vicente
26 Lopez is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
27 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
28 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,

1 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

2 163. Plaintiffs are informed and believe, and thereon allege, that defendant Shawna Lott
3 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
4 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
5 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Lott v. MGM*, filed
6 November 15, 2017, in the Clark County District Court (“Clark County”), case number A-17-
7 764736-C.

8 164. Plaintiffs are informed and believe, and thereon allege, that defendant Joshua Luiz
9 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
10 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
11 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
12 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

13 165. Plaintiffs are informed and believe, and thereon allege, that defendant Joy Lujan is
14 a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
15 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
16 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
17 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

18 166. Plaintiffs are informed and believe and thereon allege that Defendant Brittany
19 MacKay is a resident of the State of Nevada. Defendant has, through counsel, asserted or
20 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
21 Las Vegas, Nevada.

22 167. Plaintiffs are informed and believe, and thereon allege, that defendant Keri Maher
23 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
24 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
25 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
26 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

27 168. Plaintiffs are informed and believe and thereon allege that Defendant Christian
28 Marquez is a resident of the State of Nevada. Defendant has, through counsel, asserted or

1 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
2 Las Vegas, Nevada.

3 169. Plaintiffs are informed and believe, and thereon allege, that defendant Traci
4 Marshall is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
5 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
6 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
7 filed November 20, 2017, in the Los Angeles Superior Court ("LASC"), case number BC684047.

8 170. Plaintiffs are informed and believe, and thereon allege, that defendant Richard
9 Masucci is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
10 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
11 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
12 filed November 20, 2017, in the Los Angeles Superior Court ("LASC"), case number BC684047.

13 171. Plaintiffs are informed and believe, and thereon allege, that defendant Lindsey
14 Mata is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
15 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
16 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Melanson, et al. v. MGM*,
17 filed January 4, 2018, in the Clark County District Court ("Clark County"), case number A-18-
18 767288-C.

19 172. Plaintiffs are informed and believe, and thereon allege, that defendant Travis
20 Matheson is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which
21 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims
22 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v.*
23 *MGM*, filed November 20, 2017, in the Los Angeles Superior Court ("LASC"), case number
24 BC684047.

25 173. Plaintiffs are informed and believe, and thereon allege, that defendant Steve McBee
26 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
27 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
28 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,

1 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

2 174. Plaintiffs are informed and believe and thereon allege that Defendant Denise
3 McClellan is a resident of the State of Nevada. Defendant has, through counsel, asserted or
4 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
5 Las Vegas, Nevada.

6 175. Plaintiffs are informed and believe, and thereon allege, that defendant Lonnie
7 McCorvey is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which
8 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims
9 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v.*
10 *MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number
11 BC684047.

12 176. Plaintiffs are informed and believe, and thereon allege, that defendant Lynne
13 McCue is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
14 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
15 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Melanson, et al. v. MGM*,
16 filed January 4, 2018, in the Clark County District Court (“Clark County”), case number A-18-
17 767288-C.

18 177. Plaintiffs are informed and believe, and thereon allege, that defendant Tamika
19 McGill is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
20 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
21 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
22 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

23 178. Plaintiffs are informed and believe and thereon allege that Defendant Carmen
24 McKinley is a resident of the State of Nevada. Defendant has, through counsel, asserted or
25 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
26 Las Vegas, Nevada.

27 179. Plaintiffs are informed and believe, and thereon allege, that defendant Cleveland
28 McMath is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was

1 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
2 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *McMath v. MGM*, filed
3 November 15, 2017, in the Clark County District Court (“Clark County”), case number A-17-
4 764720-C.

5 180. Plaintiffs are informed and believe, and thereon allege, that defendant Doreen
6 Medina is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
7 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
8 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
9 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

10 181. Plaintiffs are informed and believe and thereon allege that Defendant Treza
11 Mekhail is a resident of the State of Nevada. Defendant has, through counsel, asserted or
12 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
13 Las Vegas, Nevada.

14 182. Plaintiffs are informed and believe, and thereon allege, that defendant Paige
15 Melanson is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which
16 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims
17 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Melanson, et al. v.*
18 *MGM*, filed January 4, 2018, in the Clark County District Court (“Clark County”), case number A-
19 18-767288-C.

20 183. Plaintiffs are informed and believe, and thereon allege, that defendant Rosemarie
21 Melanson is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which
22 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims
23 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Melanson, et al. v.*
24 *MGM*, filed January 4, 2018, in the Clark County District Court (“Clark County”), case number A-
25 18-767288-C.

26 184. Plaintiffs are informed and believe, and thereon allege, that defendant Stephanie
27 Melanson is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which
28 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims

1 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Melanson, et al. v.*
2 *MGM*, filed January 4, 2018, in the Clark County District Court (“Clark County”), case number A-
3 18-767288-C.

4 185. Plaintiffs are informed and believe, and thereon allege, that defendant Stephen
5 Melanson is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which
6 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims
7 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Melanson, et al. v.*
8 *MGM*, filed January 4, 2018, in the Clark County District Court (“Clark County”), case number A-
9 18-767288-C.

10 186. Plaintiffs are informed and believe, and thereon allege that on October 1, 2017,
11 decedent Austin Meyer, was a resident of the State of Nevada. Plaintiffs are informed and believe
12 and thereon allege that Defendant, the Estate of Austin Meyer, has, through counsel, made claims
13 against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas, Nevada, or,
14 alternatively, has indicated an intent to make such claims in the future (such as by way of the
15 filing of a separate lawsuit – now dismissed, by way of a letter of representation of counsel, or by
16 way of an evidence preservation letter from counsel).

17 187. Plaintiffs are informed and believe, and thereon allege, that defendant Romeo
18 Meyer is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
19 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
20 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
21 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

22 188. Plaintiffs are informed and believe, and thereon allege, that defendant Robert
23 Miller is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
24 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
25 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
26 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

27 189. Plaintiffs are informed and believe, and thereon allege, that defendant Phyllyssa
28 Montoya is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was

1 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
2 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
3 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

4 190. Plaintiffs are informed and believe, and thereon allege, that defendant Alyssa
5 Moore is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
6 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
7 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
8 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

9 191. Plaintiffs are informed and believe and thereon allege that Defendant Katrina
10 Morgan is a resident of the State of Nevada. Defendant has, through counsel, asserted or
11 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
12 Las Vegas, Nevada.

13 192. Plaintiffs are informed and believe, and thereon allege, that defendant Shancela
14 Myers is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
15 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
16 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
17 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

18 193. Plaintiffs are informed and believe, and thereon allege, that defendant Marirose
19 Naing is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
20 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
21 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
22 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

23 194. Plaintiffs are informed and believe, and thereon allege, that defendant Anthony
24 Don E. Noarbe is a resident of the State of Nevada. Defendant has previously filed a lawsuit
25 (which was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting
26 claims arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et*
27 *al. v. MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number
28 BC684047.

1 195. Plaintiffs are informed and believe, and thereon allege, that defendant Amber
2 Norcia is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
3 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
4 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
5 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

6 196. Plaintiffs are informed and believe and thereon allege that Defendant Elsa Nunez is
7 a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to assert
8 claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas, Nevada.

9 197. Plaintiffs are informed and believe, and thereon allege, that defendant Rose
10 O’Toole is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
11 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
12 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
13 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

14 198. Plaintiffs are informed and believe, and thereon allege, that defendant Kuulei Otis
15 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
16 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
17 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
18 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

19 199. Plaintiffs are informed and believe and thereon allege that Defendant Stacie Owens
20 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
21 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
22 Nevada.

23 200. Plaintiffs are informed and believe and thereon allege that Defendant Chad Packard
24 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
25 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
26 Nevada.

27 201. Plaintiffs are informed and believe, and thereon allege, that defendant Kaycee Paul
28 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was

1 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
2 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
3 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

4 202. Plaintiffs are informed and believe, and thereon allege, that defendant Elisa Perez is
5 a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
6 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
7 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
8 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

9 203. Plaintiffs are informed and believe, and thereon allege, that defendant Angela
10 Marie Perry is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which
11 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims
12 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v.*
13 *MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number
14 BC684047.

15 204. Plaintiffs are informed and believe, and thereon allege, that defendant Jeremy
16 Pickett is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
17 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
18 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
19 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

20 205. Plaintiffs are informed and believe, and thereon allege, that defendant Jose Plaza is
21 a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
22 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
23 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
24 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

25 206. Plaintiffs are informed and believe, and thereon allege, that defendant Mackenzie
26 Pluta is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
27 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
28 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,

1 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

2 207. Plaintiffs are informed and believe, and thereon allege, that defendant Darrian
3 Porter is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
4 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
5 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
6 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

7 208. Plaintiffs are informed and believe and thereon allege that Defendant Laura A.
8 Puglia is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened
9 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
10 Nevada.

11 209. Plaintiffs are informed and believe, and thereon allege, that defendant Karmjit Raju
12 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
13 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
14 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
15 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

16 210. Plaintiffs are informed and believe and thereon allege that Defendant Jasmine Rein
17 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
18 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
19 Nevada.

20 211. Plaintiffs are informed and believe, and thereon allege, that defendant Stanley
21 Rendon is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
22 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
23 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Spencer, et al. v. Paddock*,
24 filed October 17, 2017, in Los Angeles Superior Court (“LASC”), case number BC680065.

25 212. Plaintiffs are informed and believe and thereon allege that Defendant Lea
26 Richmond is a resident of the State of Nevada. Defendant has, through counsel, asserted or
27 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
28 Las Vegas, Nevada.

1 213. Plaintiffs are informed and believe, and thereon allege, that defendant Israel Rivera
2 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
3 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
4 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
5 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

6 214. Plaintiffs are informed and believe and thereon allege that Defendant Tonia
7 Rocheleau is a resident of the State of Nevada. Defendant has, through counsel, asserted or
8 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
9 Las Vegas, Nevada.

10 215. Plaintiffs are informed and believe and thereon allege that Defendant Michael
11 Rolland is a resident of the State of Nevada. Defendant has, through counsel, asserted or
12 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
13 Las Vegas, Nevada.

14 216. Plaintiffs are informed and believe and thereon allege that Defendant Mark Russell
15 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
16 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
17 Nevada.

18 217. Plaintiffs are informed and believe, and thereon allege, that defendant Vincent
19 Sager is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
20 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
21 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Mayfield, et al. v. MGM*,
22 filed December 15, 2017, in the Los Angeles Superior Court (“LASC”), case number BC687120.

23 218. Plaintiffs are informed and believe and thereon allege that Defendant Christopher
24 Salinas is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened
25 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
26 Nevada.

27 219. Plaintiffs are informed and believe, and thereon allege, that defendant Lenea
28 Sampson is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was

1 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
2 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Sampson v. MGM*, filed
3 November 15, 2017, in the Clark County District Court (“Clark County”), case number A-17-
4 764733-C.

5 220. Plaintiffs are informed and believe and thereon allege that Defendant Alyssa Sands
6 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
7 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
8 Nevada.

9 221. Plaintiffs are informed and believe, and thereon allege, that defendant Joseph Sartin
10 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
11 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
12 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
13 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

14 222. Plaintiffs are informed and believe, and thereon allege, that defendant Sarah
15 Scarlett is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
16 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
17 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Mayfield, et al. v. MGM*,
18 filed December 15, 2017, in the Los Angeles Superior Court (“LASC”), case number BC687120.

19 223. Plaintiffs are informed and believe, and thereon allege, that defendant Shawn
20 Scarlett is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
21 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
22 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Mayfield, et al. v. MGM*,
23 filed December 15, 2017, in the Los Angeles Superior Court (“LASC”), case number BC687120.

24 224. Plaintiffs are informed and believe, and thereon allege, that defendant Shaylenne
25 Scarlett is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
26 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
27 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Mayfield, et al. v. MGM*,
28 filed December 15, 2017, in the Los Angeles Superior Court (“LASC”), case number BC687120.

1 225. Plaintiffs are informed and believe and thereon allege that Defendant Kim Schmitz
2 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
3 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
4 Nevada.

5 226. Plaintiffs are informed and believe and thereon allege that Defendant Alison
6 Sheehe is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened
7 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
8 Nevada.

9 227. Plaintiffs are informed and believe, and thereon allege, that defendant Christopher
10 Shuemaker is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which
11 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims
12 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v.*
13 *MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number
14 BC684047.

15 228. Plaintiffs are informed and believe, and thereon allege, that defendant Breanna
16 Skagen is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
17 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
18 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Mayfield, et al. v. MGM*,
19 filed December 15, 2017, in the Los Angeles Superior Court (“LASC”), case number BC687120.

20 229. Plaintiffs are informed and believe and thereon allege that Defendant Jennifer Skoff
21 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
22 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
23 Nevada.

24 230. Plaintiffs are informed and believe, and thereon allege, that defendant Cheyenne
25 Sloan is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
26 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
27 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Melanson, et al. v. MGM*,
28 filed January 4, 2018, in the Clark County District Court (“Clark County”), case number A-18-

1 767288-C.

2 231. Plaintiffs are informed and believe and thereon allege that Defendant Eden Smith is
3 a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to assert
4 claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas, Nevada.

5 232. Plaintiffs are informed and believe, and thereon allege, that defendant Jasper Smith
6 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
7 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
8 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
9 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

10 233. Plaintiffs are informed and believe, and thereon allege, that defendant Yvonne
11 Smith is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
12 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
13 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
14 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

15 234. Plaintiffs are informed and believe and thereon allege that Defendant Martin
16 Solano is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened
17 to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
18 Nevada.

19 235. Plaintiffs are informed and believe, and thereon allege, that defendant Shelby
20 Stalker is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
21 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
22 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Melanson, et al. v. MGM*,
23 filed January 4, 2018, in the Clark County District Court (“Clark County”), case number A-18-
24 767288-C.

25 236. Plaintiffs are informed and believe and thereon allege that Defendant Chris Stewart
26 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
27 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
28 Nevada.

1 237. Plaintiffs are informed and believe, and thereon allege, that defendant Gregory
2 Tavernite is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
3 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
4 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
5 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

6 238. Plaintiffs are informed and believe and thereon allege that Defendant Sam Taylor is
7 a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to assert
8 claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas, Nevada.

9 239. Plaintiffs are informed and believe, and thereon allege, that defendant Wendy
10 Taylor-Hill is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which
11 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims
12 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v.*
13 *MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number
14 BC684047.

15 240. Plaintiffs are informed and believe, and thereon allege, that defendant Reginald
16 Tharps is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
17 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
18 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
19 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

20 241. Plaintiffs are informed and believe and thereon allege that Defendant Christina
21 Thebeau is a resident of the State of Nevada. Defendant has, through counsel, asserted or
22 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
23 Las Vegas, Nevada.

24 242. Plaintiffs are informed and believe, and thereon allege, that defendant David W.
25 Theriault is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
26 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
27 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
28 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

1 243. Plaintiffs are informed and believe, and thereon allege, that defendant Breyana
2 Thomas is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
3 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
4 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
5 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

6 244. Plaintiffs are informed and believe, and thereon allege, that defendant Gabrielle
7 Thomas is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
8 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
9 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Mayfield, et al. v. MGM*,
10 filed December 15, 2017, in the Los Angeles Superior Court (“LASC”), case number BC687120.

11 245. Plaintiffs are informed and believe, and thereon allege, that defendant Savannah
12 Thomas is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
13 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
14 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Mayfield, et al. v. MGM*,
15 filed December 15, 2017, in the Los Angeles Superior Court (“LASC”), case number BC687120.

16 246. Plaintiffs are informed and believe, and thereon allege, that defendant Steven
17 Thome is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
18 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
19 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
20 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

21 247. Plaintiffs are informed and believe, and thereon allege, that defendant Alva Bruce
22 Tilley is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
23 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
24 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
25 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

26 248. Plaintiffs are informed and believe and thereon allege that Defendant Mariya Toro
27 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
28 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,

1 Nevada.

2 249. Plaintiffs are informed and believe, and thereon allege, that defendant Kathryn
3 Tressler is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
4 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
5 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Tressler v. MGM*, filed
6 November 15, 2017, in the Clark County District Court (“Clark County”), case number A-17-
7 764722-C.

8 250. Plaintiffs are informed and believe, and thereon allege, that defendant Jennifer A.
9 Turner is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
10 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
11 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
12 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

13 251. Plaintiffs are informed and believe and thereon allege that Defendant Deborah
14 Urrizaga is a resident of the State of Nevada. Defendant has, through counsel, asserted or
15 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
16 Las Vegas, Nevada.

17 252. Plaintiffs are informed and believe, and thereon allege, that defendant William F.
18 Vanderveer is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which
19 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims
20 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v.*
21 *MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number
22 BC684047.

23 253. Plaintiffs are informed and believe, and thereon allege, that defendant Frank
24 Vealencis is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which
25 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims
26 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v.*
27 *MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number
28 BC684047.

1 254. Plaintiffs are informed and believe, and thereon allege, that defendant Tamara
2 Vealencis is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which
3 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims
4 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v.*
5 *MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number
6 BC684047.

7 255. Plaintiffs are informed and believe and thereon allege that Defendant Regina Viola
8 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
9 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
10 Nevada.

11 256. Plaintiffs are informed and believe, and thereon allege, that defendant Alyssa
12 Walker is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
13 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
14 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
15 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

16 257. Plaintiffs are informed and believe, and thereon allege, that defendant Tikiesha
17 Wasp is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
18 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
19 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
20 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

21 258. Plaintiffs are informed and believe, and thereon allege, that defendant Donald
22 Welty is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
23 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
24 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
25 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

26 259. Plaintiffs are informed and believe, and thereon allege, that defendant Zachary
27 Wilcox is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
28 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising

1 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
2 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

3 260. Plaintiffs are informed and believe, and thereon allege, that defendant Jordan
4 Wilkinson is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which
5 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims
6 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v.*
7 *MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number
8 BC684047.

9 261. Plaintiffs are informed and believe, and thereon allege, that defendant Jeffery
10 Williams is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
11 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
12 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
13 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

14 262. Plaintiffs are informed and believe, and thereon allege, that defendant Teracio
15 Williams is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
16 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
17 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,
18 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

19 263. Plaintiffs are informed and believe, and thereon allege, that defendant Gary “Opie”
20 Allen Wise is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which
21 was subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims
22 arising from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v.*
23 *MGM*, filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number
24 BC684047.

25 264. Plaintiffs are informed and believe, and thereon allege, that defendant John Yonts
26 is a resident of the State of Nevada. Defendant has previously filed a lawsuit (which was
27 subsequently voluntarily dismissed) against one or more of the Plaintiffs, asserting claims arising
28 from the October 1, 2017, shooting incident in Las Vegas, Nevada, in *Abraham, et al. v. MGM*,

1 filed November 20, 2017, in the Los Angeles Superior Court (“LASC”), case number BC684047.

2 265. Plaintiffs are informed and believe and thereon allege that Defendant Jamie Zaleski
3 is a resident of the State of Nevada. Defendant has, through counsel, asserted or threatened to
4 assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in Las Vegas,
5 Nevada.

6 266. Plaintiffs are informed and believe and thereon allege that Defendant Janet
7 Zmyewski is a resident of the State of Nevada. Defendant has, through counsel, asserted or
8 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
9 Las Vegas, Nevada.

10 267. Plaintiffs are informed and believe and thereon allege that Defendant Thomas
11 Zmyewski is a resident of the State of Nevada. Defendant has, through counsel, asserted or
12 threatened to assert claims against Plaintiffs based upon the October 1, 2017, shooting incident in
13 Las Vegas, Nevada.

14 **JURISDICTION AND VENUE**

15 268. This Court has subject-matter jurisdiction pursuant to 28 U.S.C. § 1331 and 6
16 U.S.C. §442(a). As alleged hereinabove, the SAFETY Act expressly provides for original and
17 exclusive federal jurisdiction over actions arising from or relating to acts of mass violence where
18 technologies or services certified by the Secretary of Homeland Security were deployed. At the
19 time of Paddock’s mass attack at the Route 91 concert, security services were provided by
20 Contemporary Services Corporation as the Security Vendor for the Route 91 Harvest Festival.
21 CSC’s security services were certified by the Secretary of Homeland Security under the SAFETY
22 Act.

23 269. This Court has personal jurisdiction over Defendants because they are residents of
24 the State of Nevada and are therefore subject to the general personal jurisdiction of this Court.

25 270. Venue is proper in this Judicial District pursuant to 28 U.S.C.
26 § 1391(b)(1) because one or more of the Defendants are known to reside, or upon information and
27 belief, do reside, within this Judicial District.

FIRST CAUSE OF ACTION FOR DECLATORY RELIEF

(By Plaintiffs against all Defendants)

271. Plaintiffs reallege and incorporate by reference, as though fully set forth, the allegations of paragraphs 1-270, above.

272. Following Paddock's mass attack on the concert, over 2,500 individuals have either sued the MGM Parties, or threatened to sue the MGM Parties, for claims alleged to arise from or relate to the attack. Several hundred individuals filed suit, and before the issues could be joined or resolved, they dismissed their claims, apparently with the intent of refileing.

273. Each Defendant either (a) has previously filed suit (and then dismissed it) against one or more of the MGM Parties relating to the Paddock attack, or (b) through counsel has stated an intention to sue the MGM Parties relating to the attack. There is no pending litigation between Plaintiffs and Defendants relating to the attack.

274. The claims alleged in the now-dismissed lawsuits include claims of alleged negligence by the MGM Parties and others, including CSC, in protecting and safeguarding persons including those Defendants who attended the Route 91 Festival.

275. Defendants' actual and threatened lawsuits implicate the services provided by CSC because they implicate security at the concert, including training, emergency response, evacuation and adequacy of egress.

276. These claims are subject to the SAFETY Act, because (a) they arise from and relate to an act of mass violence meeting the statutory requirements; (b) CSC provided security at the concert, deploying services certified by the Department of Homeland Security under the SAFETY Act to protect against or respond to such an attack; and (c) the claims may therefore result in loss to CSC as the "Seller" of such certified services.

277. The claims threatened against the MGM Parties by certain Defendants, through counsel, also inevitably fall under the SAFETY Act for the very same reasons: (a) they arise from and relate to an act of mass violence meeting the statutory requirements; (b) CSC provided security at the concert, deploying services certified by the Department of Homeland Security under the SAFETY Act to protect against or respond to such an attack; and (c) the claims may

1 therefore result in loss to CSC as the “Seller” of such certified services. If Defendants were injured
2 by Paddock’s assault, as they allege, they were inevitably injured both because Paddock fired from
3 his window *and* because they remained in the line of fire at the concert. Such claims inevitably
4 implicate security at the concert—and may result in loss to CSC.

5 278. The SAFETY Act applies to claims “arising out of, relating to, or resulting from an
6 act of terrorism.”

7 279. The SAFETY Act defines an act of terrorism: An act meets the requirements if the
8 act is (i) “unlawful” (ii) “causes harm to a person ... in the United States,” and (iii) “uses or
9 attempts to use ... weapons ... designed or intended to cause mass ... injury.” 6 U.S.C. §
10 444(2)(B). There is no requirement in the statute or regulations of an ideological motive or
11 objective for the attack for it to meet the requirements of the SAFETY Act.

12 280. Paddock’s mass attack satisfies the requirements of the SAFETY Act and the
13 regulations: (i) it was “unlawful,” (ii) it resulted in death or injury to hundreds of persons in the
14 United States, and (iii) it involved weapons and other instrumentalities that were designed and
15 intended to cause, and which in fact caused, mass injury and death. Those weapons and
16 instrumentalities included rifles modified with bump stocks to spray fully automatic gun fire;
17 high-capacity magazines capable of holding between 60 and 100 rounds; and illegal incendiary
18 rounds intended to blow up the fuel tanks adjacent to the concert. Paddock used these weapons
19 and instrumentalities to fire hundreds of rounds at the crowd, and he fired incendiary rounds
20 which struck the fuel tanks but, fortunately, missed the fuel.

21 281. The post-attack investigation revealed that Paddock brought in his van, which he
22 parked in the hotel garage, 90 pounds of explosives, consisting of 20 two-pound containers of
23 exploding targets, 10 one-pound containers of exploding targets and 2 twenty-pound bags of
24 explosive precursors.

25 282. No MGM Party attempted to commit, knowingly participated in, aided, abetted,
26 committed, or participated in any conspiracy to commit any act of terrorism of criminal act related
27 to mass attack perpetrated by Stephen Paddock at the Route 91 Harvest Festival in Las Vegas,
28 Nevada, on October 1, 2017.

1 283. The Secretary of Homeland Security may make a determination that conduct in
2 question meets the statutory requirement, but neither the Act nor the regulations requires a formal
3 certification. The Statute provides that the Secretary shall have exclusive authority to certify
4 services, but the authority to determine whether an act of mass violence meets the statutory
5 requirements is not exclusive to the Secretary.

6 284. Public statements by the Secretary of Homeland Security concerning the attack
7 make clear that the attack meets the requirements of the SAFETY Act; indeed, based on the plain
8 language of the statute, the regulations, and the facts, no other determination could be possible.

9 285. In congressional testimony on November 30, 2017, the Acting Secretary of
10 Homeland Security noted the emphasis of “terrorists and other violent criminals ... on attacking
11 soft targets,” including “recent tragedies in Nevada.” The Acting Secretary went on to note that
12 the “SAFETY Act Program” “provide[s] critical incentives for the development and deployment
13 of anti-terrorism technologies by providing liability protections for ‘qualified anti-terrorism
14 technologies,’” which applies to a number of large sports and entertainment venues nationwide.

15 286. In a May 2018 release, Department of Homeland Security noted that “mass
16 shootings” in various places, including at a “concert,” aim “to kill and maim unsuspecting
17 individuals” and thereby fall within the Department’s “primary mission” “to prevent terrorist
18 attacks within the U.S, reduce the vulnerability of the U.S. to terrorism, and minimize the damage
19 and assist in the recovery from terrorist attacks that do occur, including those in ST-CPs [soft-
20 targets-crowded places].” Department of Homeland Security, *Soft Targets and Crowded Places*
21 *Security Plan Overview*, May 2018, at page 2. The report goes on to note that the protections of
22 the SAFETY Act have been “approved for open venues such as sports arenas and stadia” – such as
23 the venue for the Route 91 Festival. *Id.* at p. 17.

24 287. The Department continues its critical work to prevent and respond to mass
25 violence. In Congressional testimony on May 15, 2018, the Secretary testified that DHS is
26 “seeking to ramp up ‘soft target’ security efforts,” noting that DHS programs “address threats to
27 soft targets – including schools, *entertainment venues*, major events, and public spaces” (emphasis
28 added). Further, on June 4, 2018, DHS announced that it had “developed a ST-CP Security

Enhancement and Coordination Plan,” which has not been made public. The plan addresses “the increased emphasis *by terrorists* and other extremist actors to leverage less sophisticated methods to inflict harm in public areas ... such as parks, ... *special event venues*, and similar facilities.”

See <https://www.dhs.gov/publication/securing-soft-targets-and-crowded-spaces> (emphasis added).

288. The SAFETY Act creates a single, exclusive federal cause of action for claims for injuries arising out of or relating to acts of mass violence where services certified by the Department of Homeland Security were deployed in defense against, response to, or recovery from such act and such claims result or may result in loss to the Seller.

289. Pursuant to the SAFETY Act, the Department of Homeland Security has certified the services provided by CSC. The DHS Certification recognizes CSC’s security services as appropriate for preventing and responding to acts of mass violence. 6 U.S.C. § 441; *see also* 48 C.F.R. § 50.201.

290. CSC’s security services Certified by DHS include “Physical Security”; “Access Control”; and “Crowd Management.”

291. CSC’s Certified Crowd Management Services include:

- “Awareness of venue-specific emergency response protocols and evacuation procedures to include emergency alert and mass-notification systems and sheltering procedures”;
- “Pre-event venue / event safety inspections”;
- “Facilitation of crowd movement during ingress, circulation, sheltering in place, emergency evacuations, and egress”;
- “Pre-event coordination and multi-agency collaboration with public safety agencies”;
- “Selection, vetting, and training of employees.”

292. As alleged above, CSC was employed as the Security Vendor for the Route 91 concert. CSC’s responsibilities at the Route 91 Harvest Festival included providing the following DHS Certified Services:

- “perimeter security, event access, festival grounds event security”;
- “Staff[ing] inner perimeter and gates”;

- 1 • “Protect[ing] against unauthorized access”;
- 2 • “early warning ... of perimeter breaches”;
- 3 • “Secur[ing] internal festival grounds”;
- 4 • “Patrol[ing] festival floor grounds and assist[ing] patrons with any security related
- 5 issues”;
- 6 • pre-event planning for “Security and Safety”;
- 7 • “Emergency response” and “evacuation,” including evacuation for “terrorist threat”
- 8 and “ensur[ing] that the exit routes and gates remain unobstructed.”

9 293. For the reasons set forth above, the SAFETY Act creates an exclusive cause of
 10 action for any claims arising out of relating to Paddock’s mass attack and such claims may result
 11 in loss to the Seller. Under the SAFETY Act, there “shall exist only one cause of action for loss
 12 of property, personal injury, or death. 6 C.F.R. 25.7 (d).

13 294. Such cause of action “may be brought only against the Seller of the Qualified Anti-
 14 Terrorism Technology and may not be brought against the buyers, the buyer’s contractors, or
 15 downstream users of the Technology, the Seller’s suppliers or contractors, or any other person or
 16 entity.” 6 C.F.R. 25.7 (d). The SAFETY Act precludes any liability on the part of Plaintiffs to
 17 Defendants relating to Paddock’s mass attack.

18 295. In addition, the SAFETY Act provides that for any covered claims arising out of or
 19 relating to an act of mass violence where certified services were provided, “the government
 20 contractor defense applies in such a lawsuit,” which provides a complete defense to liability. 6
 21 U.S.C. 442(d)(1). The government contractor defense precludes any finding of liability on the part
 22 of Plaintiffs to Defendants relating to Paddock’s mass attack.

23 296. An actual and justiciable controversy exists between Plaintiffs and Defendants
 24 concerning the applicability of the SAFETY Act. Plaintiffs assert that the SAFETY Act precludes
 25 any liability for any claims arising out of or relating to Paddock’s mass attack, whereas, on
 26 information and belief, Defendants deny that the Act applies or that it precludes liability on their
 27 claims against Plaintiffs.

28 297. A judicial declaration as to whether the SAFETY Act applies and precludes

1 liability on Defendants' claims against the Plaintiffs is necessary at this time so that the parties
2 may ascertain their rights, and avoid the significant judicial waste that would occur if the lawsuits
3 were allowed to proceed in the absence of a finding as to the applicability of the SAFETY Act.

4 **PRAYER FOR RELIEF**

5 WHEREFORE, Plaintiffs MGM Parties pray for judgment against Defendants, and each of
6 them, as follows:

- 7 1. For a judicial declaration that:
- 8 a. Defendants' claims arising from the attack by Stephen Paddock on October 1, 2017
9 in Las Vegas, Nevada are subject to and governed by the SAFETY Act, 6 U.S.C. §
10 441 et seq.;
- 11 b. the SAFETY Act precludes any finding of liability against Plaintiffs for any claim
12 for injuries arising out of or related to Paddock's mass attack, without prejudice to
13 Defendants' rights to pursue claims against the "Seller" under the Act, including to
14 obtain proceeds of insurance that any such Seller was required by the Act to
15 maintain;
- 16 c. Plaintiffs have no liability of any kind to Defendants, or any of them, arising from
17 the Paddock's mass attack; and
- 18 2. For such other and further legal or equitable relief as the Court deems just and proper.

19 DATED: July 13, 2018

PISANELLI BICE

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21 By: /s/ James J. Pisanelli

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